

# Exhibit A



Deposition of:  
**Colleen Taylor , M.D.**

*July 11, 2017*

In the Matter of:  
**In Re: Bard IVC Filters Products  
Liability**

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In Re: Bard IVC Filters Products Liability

Page 1

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

In re Bard IVC Filters  
Products Liability  
Litigation

NO. MD-15-02641  
PHX-DGC

VIDEOTAPED DEPOSITION OF  
COLLEEN TAYLOR, M.D.  
July 11, 2017 - 9:47 a.m.  
Bouhan Falligant  
One West Park Avenue  
Savannah, Georgia

Deborah K. Lingonis, RPR, CCR 2883

## In Re: Bard IVC Filters Products Liability

Page 48

1 Q. Mrs. Jones -- Well, let me just back up for a  
2 minute and start that over.

3 This lawsuit, Dr. Taylor, is about an IVC  
4 filter that was implanted in Mrs. Jones and explanted  
5 from Mrs. Jones except for a piece that broke off  
6 before you saw her. I'm not asking you a question.  
7 I'm giving you that as background.

8 When she saw you, she had a piece of that  
9 filter still in her in her pulmonary artery. Did any  
10 of your care and treatment of Mrs. Jones relate to that  
11 piece of the filter that was in her pulmonary artery?

12 THE WITNESS: No, sir.

13 MR. GHOSH: Object to the form.

14 BY MR. STOLLER:

15 Q. Let me ask you -- you were asked a number of  
16 questions about some documents. So if you would start  
17 with Exhibit 5, which is in front of you on your right.  
18 Mr. Ghosh asked you some questions about this document  
19 which is an X-ray report, correct?

20 A. Correct.

21 Q. You didn't take the X-ray at issue here,  
22 correct?

23 A. No, sir.

24 Q. Did you read or interpret the X-ray or the  
25 films?